

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ORIGINAL

- - - - - X
:
UNITED STATES OF AMERICA
:
- v. -
:
MATTHEW GOLDFARB,
:
Defendant.
:
- - - - - X

INFORMATION
15 Cr. 399

COUNT ONE
(Distribution of Child Pornography)

The United States Attorney charges:

1. From at least in or about July 2014 up to and including in or about November 2014, in the Southern District of New York and elsewhere, MATTHEW GOLDFARB, the defendant, knowingly received and distributed material containing child pornography that had been mailed, and using means and facilities of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, GOLDFARB received and distributed videos and images of child pornography via a computer over the Internet.

(Title 18, United States Code, Sections 2252A(a)(2)(B)
and 2252A(b)(1).)

FORFEITURE ALLEGATION

2. As a result of committing the offense alleged in Count One of this Information, MATTHEW GOLDFARB, the defendant,

shall forfeit to the United States pursuant to 18 U.S.C. § 2253: any visual depiction described in 18 U.S.C. §§ 2251, 2251A, 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of 18 U.S.C. § 2251 et seq.; all property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and all property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.


Substitute Assets Provision

3. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third person;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value;
- or

e. has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to 18 U.S.C. § 2253(b), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 2253.)

A handwritten signature in cursive script, reading "Preet Bharara", is positioned above a horizontal line.

PREET BHARARA
United States Attorney

